

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**CATHOLIC LEGAL IMMIGRATION  
NETWORK, INC., et al.,**

Plaintiffs,

V.

Civil Action No. 8:20-cv-02042-TDC

**UNITED STATES CITIZENSHIP AND  
IMMIGRATION SERVICES, et al.,**

Defendants.

## JOINT STATUS REPORT

In accordance with the parties' proposal to submit a joint status report on a monthly basis, as stated in their Joint Motion to Stay All Proceedings filed on September 28, 2020 (ECF No. 18 at 6), the parties, by and through undersigned counsel, hereby file this Joint Status Report, and state as follows:

1. Catholic Legal Immigration Network, Inc., Alianza Americas, and National TPS Alliance (Plaintiffs) commenced the instant action against the United States Citizenship and Immigration Services (USCIS), United States Department of Homeland Security (DHS), and United States Department of State (State), (collectively, Defendants) to compel compliance with the Freedom of Information Act (FOIA). Specifically, the Complaint seeks responses to three separate FOIA requests submitted to USCIS (“Request 1”), State (“Request 2”), and DHS (“Request 3”) respectively. (Compl. ¶¶ 27-40.)

2. On March 8, 2021, USCIS produced its fifth rolling release of documents comprised of 7 pages and 140 partially produced pages from the Office of Policy and Strategy component (OP&S) to Plaintiffs in response to Request 1. USCIS also produced 105 pages (with portions withheld) in supplement to its second rolling release, and 13 pages in supplement to its

third rolling release, which had been referred to the U.S. Department of Homeland Security for consultation. USCIS is presently processing the sixth production of USCIS pages. Subject to FOIA exemptions, the sixth production of USCIS pages is expected to be produced on or about April 6, 2021. Per the request of Plaintiffs, the sixth production will consist of responsive, non-FOIA exempt documents from OP&S.

3. On February 17, 2021, State produced its third rolling release of documents comprised of 45 records released in part. State is continuing to collect unclassified potentially responsive documents. The fourth production of responsive, non-exempt material, to the extent any such material is identified, will be made on or before March 17, 2021. While searches for records on classified systems continue to be inhibited by the ongoing impact of COVID-19 mitigation measures on staffing, State will initiate searches of classified systems promptly upon the relevant employees re-obtaining access to those systems.

4. The parties are continuing to engage in discussions regarding the possible narrowing or prioritization of Plaintiffs' FOIA requests.

Dated: March 15, 2021

Respectfully submitted,

\_\_\_\_\_/s/\_\_\_\_\_  
Khaled Alrabe  
Amber Qureshi  
National Immigration Project of the  
National Lawyers Guild  
2201 Wisconsin Ave., NW Suite 200  
Washington, DC 20007  
Tel: (510) 679-3994  
alrabe@nipnl.org  
amber@nipnl.org

\_\_\_\_/s/\_\_\_\_

Victoria Neilson  
Michelle N. Mendez  
Catholic Legal Immigration Network (CLINIC)  
8757 Georgia Ave., Suite 850  
Silver Spring, MD 20910  
Tel: (540) 907-1761  
Fax: (301) 565-4824  
vneilson@cliniclegal.org  
mmendez@cliniclegal.org

Jonathan F. Lenzner  
Acting United States Attorney

\_\_\_\_/s/\_\_\_\_

Kimberly S. Phillips  
Assistant United States Attorney  
36 S. Charles St., 4th Flr.  
Baltimore, MD 21201  
Tel: (410) 209-4800  
Kimberly.Phillips@usdoj.gov